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Attorneys for Defendant,

ALBERTSONS LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TERRI L. APPLE, an individual,

Plaintiff,

vs.

ALBERTSONS LLC, a Foreign Limited-Liability
Company, DOES I-X, and ROE CORPORATIONS I-
X, inclusive,

Defendants.

CASE NO.: 2:22-cv-01140-JCM-EJY

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE JOINT
PRETRIAL ORDER**

(First Request)

COMES NOW, Defendant, ALBERTSON'S, LLC, by and through its attorneys, LEW BRANDON, JR., ESQ. and RYAN VENCI, ESQ. and Plaintiff, TERRI APPLE, by and through her attorney, KEVIN M. HANRATTY, ESQ. and hereby stipulate to extend the date to file the Joint Pre-Trial Order by thirty (30) days. This is the parties first stipulation and request for an extension of time to file the Joint Pre-Trial Order.

Defendant filed a Motion for Partial Summary Judgment on August 21, 2023 (ECF #16). The Stipulated Discovery Plan and Scheduling Order (ECF #14) included a date for the filing of the Joint Pretrial Order of September 25, 2023, if no dispositive motions were filed. The Court issued its Order on Defendant's Motion for Partial Summary Judgment on February 5, 2024. Per Rule, this made the due date for the filing

1 of the Joint Pretrial Order March 7, 2024. On March 7, 2024, Defendant requested the Court extend the date
2 for the filing of the Joint Pretrial Order by thirty (30) days as the parties work to finalize the same. (ECF
3 #21). On March 15, 2024, the Court issued a Minute Order denied the Request and instructed Defendant to
4 either file an unopposed motion or stipulation to extend the time or the parties were to file the Joint Pre-Trial
5 Order by March 18, 2023 (ECF #22).

7 The parties have been attempting to prepare and file the Joint Pre-Trial Order. However, the parties
8 were unable to communicate about it prior to the deadline and in following up since there was an emergency
9 situation that required Plaintiff counsel's attention which resulted in the parties' being unable to finalize the
10 Joint Pre-Trial Order or submit a stipulation regarding the same. As such, the parties believe excusable

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neglect exists and request the Court grant additional time to submit the Joint Pre-Trial Order. The parties respectfully request until April 4, 2024, to submit the Joint Pre-Trial Order

DATED this 18th day of March, 2024.

DATED this 18th day of March, 2024.

HANRATTY LAW GROUP

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Counsel for Defendant

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT

JUDGE Dated: March 18, 2024